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September 3, 2010

Mr. Steve Tzhone, EPA Project Coordinator (6SF-RA)
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: San Jacinto River Waste Pits Superfund Site
Revised Draft Final RI/FS Work Plan;
U.S. EPA Region 6, CERLCA Docket No. 06-03-10 UAO for RI/FS
Project Number: 090557-01

Dear Steve:

This letter is being submitted jointly on behalf of International Paper Company ("International Paper") and McGinnes Industrial Maintenance Corporation ("MIMC"), as Respondents under the above-referenced UAO. Capitalized terms used in this letter, and not otherwise defined, have the meaning ascribed to such terms in the UAO.

The enclosed revised Draft Final of the San Jacinto River Waste Pits RI/FS Work Plan incorporates all agreed upon responses to agency comments received on June 3, 2010, and additional comments received from EPA in an email from you on August 26, 2010. We have also provided the draft final comment/response table as an appendix to the report. You will see that we have incorporated all of the requested changes in the additional comments received from EPA on August 26, except comment four which is related to performing soil sampling near an impoundment reportedly located south of I-10. The Respondents do not feel soil sampling in this area is appropriate at this time based on the following technical justifications:

- No evidence of releases or threatened releases from the impoundment located south of I-10 has been identified. In fact, soil and sediment data generated as part of the recent RI/FS and TCRA-related activities indicate that there have been no releases to

the environment from the south impoundment (Figure 1). These data include the following:

- Preliminary data from recent sampling of soils in the Texas Department of Transportation ("TxDOT") right-of-way on the south side of the I-10 bridge adjacent to the location of the south impoundment show the concentration of 2,3,7,8 TCDD was estimated (i.e. J-flagged) value of 0.55 ng/kg-estimated values indicate concentrations are very close to the analytical detection limit. Conversely, samples taken on the south side of I-10 in the TxDOT right-of-way, and closer to the northern impoundments, had concentrations of 5.76 ng/kg dw and 2.2 ng/kg dw 2,3,7,8 TCDD.

- Sediment data collected for the RI in May of 2010 from within the Old River, within 200 feet of shore and to the west of the south impoundment, show very low concentrations of dioxins and furans. 2,3,7,8-TCDD concentrations in the three surface sediment samples west of the south impoundment ranged from 3.10 to 4.98 ng/kg dw. Moreover, the dioxin and furan signature in the sediment samples obtained by the Respondents in 2010 from the three stations directly adjacent to the south impoundment, and of a sediment sample collected in this area by TCEQ in 2005, match the signature characteristic of dioxins and furans in urban background samples, and match the dioxin and furan signature in sediments from the upstream background stations sampled by the Respondents during the RI in 2010. At the nearest station in the Old River, downstream from the south impoundment area, sampled in 2010 during the RI, 2,3,7,8 TCDD was not detected. These results clearly indicate that a release has not occurred from the south impoundment into the Old River.

- A substantial amount of fill has been placed over the entire peninsula south of I-10 where the south impoundment may be located, and the land over that fill has been developed by a variety of industrial facilities, manufacturing facilities, boat and ship maintenance operations, parking lots, public roadways and associated right-of-ways.

- The fill, buildings, parking lots, and other impermeable surfaces on the peninsula south of I-10 have likely further restricted any potential for releases or threatened releases from the impoundment under consideration.

In addition, please note a revision to the document that was not requested by EPA in the comments sent August 26, 2010. The 2009 UAO included a schedule of deliverables for the RI/FS and Figures 8-1a and 8-1b of the draft RI/FS reflected those UAO requirements. However, as we have discussed by phone, the UAO schedule resulted in delivery of the Remedial Investigation (RI) Report four and a half months before delivery of the Human Health Risk Assessment (HHRA) Report. Because the RI Report needs to describe the findings of the HHRA, the schedule has been revised. The revised schedule shows the date of delivery of the RI Report (formerly February 2, 2012) to coincide with the date of delivery of the HHRA Report, which is June 14, 2012. This also results in a corresponding shift in the schedule of the Feasibility Study Report.

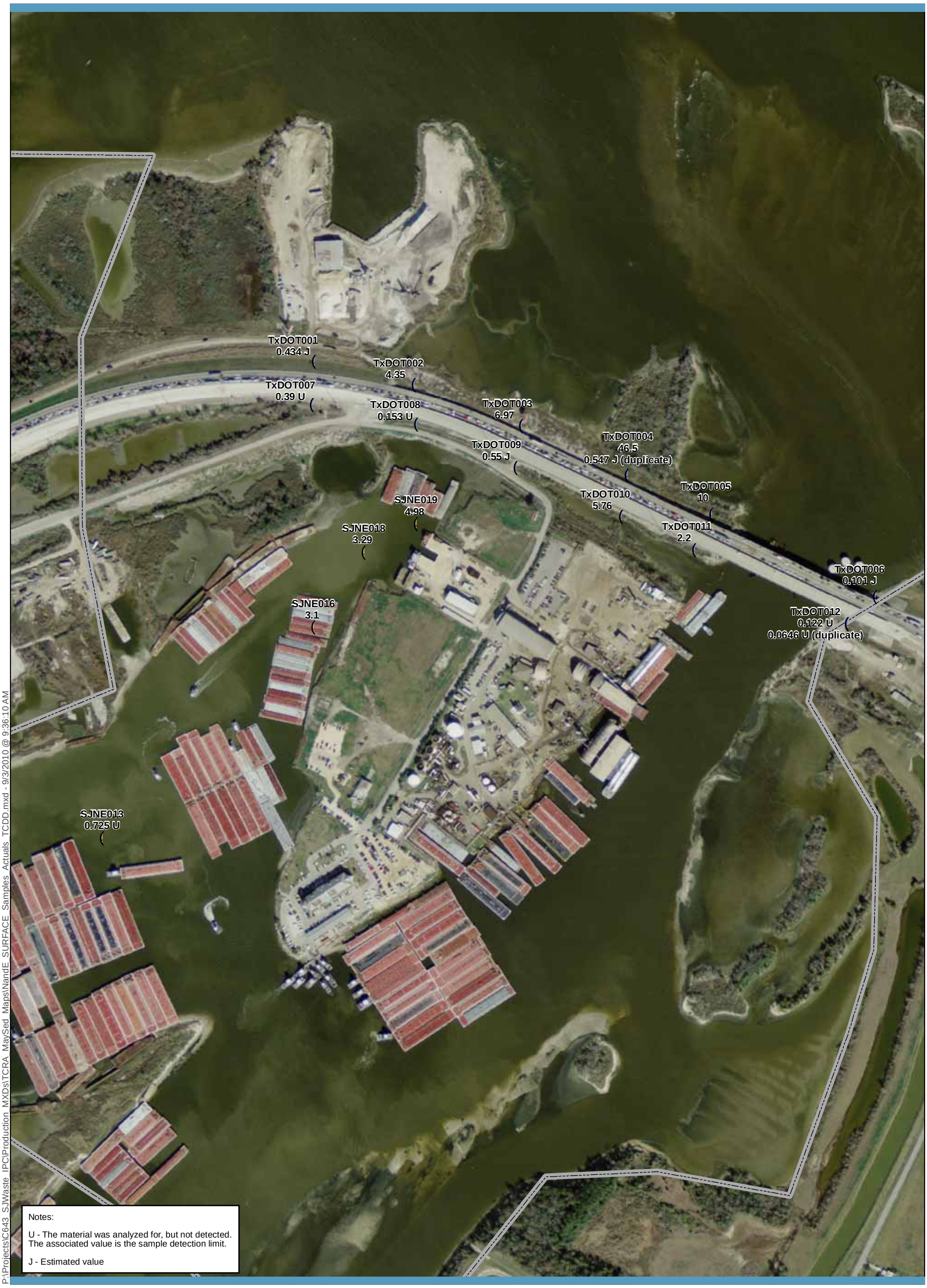
Please do not hesitate to contact me if you have any questions or concerns about this submittal. We are looking forward to working with you on the implementation of this work plan.

Sincerely,

David C. Keith

David C. Keith
Anchor QEA, LLC

Attachments



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integral consulting inc.

Preliminary Site Perimeter

RI Sediment Station, May, 2010

TCRA Soil Station
(Preliminary, Unvalidated Data)

0 500
Scale in Feet

FEATURE SOURCES:
Aerial Imagery: 0.5-meter January 2009 DOQQs - Texas Strategic Mapping Program (StratMap), TNIS

Figure 1
2,3,7,8-TCDD (ng/kg dw) in Sediments Collected for the RI, and in Soil Collected for the TCRA
SJRWP Superfund/MIMC and IPC